

REMARKS

With this Amendment, claims 76 and 77 are added, and claims 70-75 are amended. No new matter is added. Therefore, claims 2, 3, 5-7, 9-11, 13-15, 17-19, 21-23, 25-31, 33-38, 40-42, 44-46, 48-50, 52-54, 56-62, and 65-77 are all the claims currently pending in this Application.

Claims 2, 3, 5-7, 9-11, 13-15, 17-19, 21-23, 25-31, 33-38, 40-42, 44-46, 48-50, 52-54, 56-62, and 65-75 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Kano (U.S. Patent 5,359,513) in view of Hiyama (U.S. Patent 5,379,757). Applicants respectfully traverse this rejection.

Regarding independent claims 71, 72, 74, and 75, as well as dependent claims 76 and 77, Applicants submit that the cited references fail to teach or suggest appending history data to sets of base image data as header data. Regarding the limitation of recording history data on past inter-image operations, the Examiner asserts that Kano, which describes that the “locations of the detected possible interval changes” can be indicated using arrows superimposed on the original images. The Examiner then asserts that because the arrows are stored with the original images that this teaches the claimed limitation of recording history data. However, Applicants submit that there is no teaching or suggestion in Kano or in Hiyama of appending history data as header data for sets of base image data, as claimed. Therefore, Applicants submit that claims 71, 72, 74, 75, 76 and 77 are patentable over any reasonable combination of the cited references.

Regarding independent claims 70 and 73, Applicants submit that the cited references fail to teach or suggest attaching history data to sets of base image data, where the history data is subtraction processing history data. As noted above, the Examiner refers to Kano as teaching this

limitation. However, according to these embodiments of the present invention, inter-image operations are performed on base image data (past subtraction processes), and the history data attached to the sets of base image data is data on the past subtraction processes. In contrast, the arrows pointing to “interval changes” discussed in Kano merely indicate locations or points where changes may have occurred. Additionally, Kano merely suggests displaying the locations of “interval changes” on the image data. Kano does not teach or suggest attaching data to the data of the original images to improve the efficiency of comparison-interpretation or images by omitting repetitive subtraction processes. Further, Applicants submit that Hiyama fails to remedy these deficiencies of Kano. Therefore, Applicants submit that independent claims 70 and 73 and claims 2, 3, 5-7, 9-11, 13-15, 17-19, 21-23, 25-31, 33-38, 40-42, 44-46, 48-50, 52-54, 56-62, 65-69, 76, and 77 which depend therefrom are patentable over any reasonable combination of the cited references.

In view of the above, Applicants respectfully request that the rejections of claims 2, 3, 5-7, 9-11, 13-15, 17-19, 21-23, 25-31, 33-38, 40-42, 44-46, 48-50, 52-54, 56-62, and 65-75 be reconsidered and withdrawn and that new claims 76 and 77 be allowed.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned attorney at the telephone number listed below.

AMENDMENT UNDER 37 C.F.R. §1.111
U.S. Application No. 09/774,577

Q61225

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.


Respectfully submitted,

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373

CUSTOMER NUMBER



Laura Moskowitz
Registration No. 55,470

Date: February 28, 2007